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13 SUPERIOR COURT OF THE STATE OF CALIFORNIA,
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15 **UNITED STATES DISTRICT COURT**

16 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

17 ARLENE JUNIOR, } Case No. 22-CV-07270-WHO
18 Plaintiff, }
19 vs. } **STIPULATED REQUEST FOR
ORDER EXTENDING DISCOVERY
DEADLINE AND (PROPOSED)
ORDER**
20 SUPERIOR COURT OF THE STATE OF } Hon. William H. Orrick
21 CALIFORNIA, COUNTY OF SONOMA, }
and SHELLY AVERILL, } Action Filed: November 17, 2022
22 Defendants. } Trial Date: August 12, 2024

23
24 Pursuant to Local Rules 6-1 and 6-2, the parties through undersigned counsel
25 hereby stipulate and respectfully request that the Court extend the deadline to complete
26 fact and expert discovery in this case by 30 days, to March 14, 2024.

The parties stipulate as follows:

WHEREAS, On February 21, 2023, the parties appeared before this Court for a Case Management Conference (ECF No. 15);

WHEREAS, during the Case Management Conference, and upon stipulation of the parties, this Court set the date upon which fact discovery would close as December 15, 2023;

WHEREAS, the parties participated in a mediation on November 30, 2023, which was unsuccessful;

WHEREAS, this Court previously granted the parties' stipulated request for a 60-day extension of the discovery deadline to February 13, 2024 (ECF No. 22);

WHEREAS, despite diligent efforts, the parties are unable to complete discovery in this case by February 13, 2024;

WHEREAS, the parties believe that they require a 30-day extension of the discovery deadline, until March 14, 2024, to complete fact and expert discovery, including the deadline to file motions related to fact discovery;

WHEREAS, the proposed extension would not affect the other dates fixed by this Court;

WHEREAS, good cause exists to modify the Scheduling Order to extend the deadline for fact and expert discovery to March 14, 2024.

IT IS SO STIPULATED.

Dated: February 12, 2024

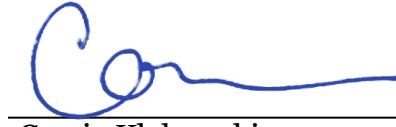
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1 **[PROPOSED] ORDER**
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4 Based on the Parties' Stipulated Request for Order Changing Time, and good
5 cause appearing:

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- The deadline for the parties to complete fact and expert discovery, including the
7 deadline to file motions related to fact discovery, is extended to March 14, 2024.
- All other deadlines set shall remain unchanged.

8 **IT IS SO ORDERED.**

9 Dated: February ___, 2024

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12 _____
13 Hon. William H. Orrick
14 United States District Court Judge
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